

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MARCUS GRAY P/K/A FLAME; EMANUEL)	
LAMBERT; and CHIKE OJUKWU,)	
)	Civil Action No.: 4:14-cv-01183-HEA
Plaintiffs,)	
)	
vs.)	
)	
KATY PERRY; JORDAN HOUSTON P/K/A)	
JUICY J; LUKASZ GOTTWALD P/K/A)	
DR. LUKE; SARAH THERESA HUDSON;)	
MAX MARTIN; HENRY RUSSELL WALTER)	
P/K/A CIRKUT; and CAPITOL RECORDS,)	
LLC,)	
Defendants.)	
)	
)	
)	

**MOTION OF KATHERYN HUDSON (P/K/A “KATY PERRY”) TO DISMISS THE
FIRST AMENDED COMPLAINT FOR LACK OF PERSONAL JURISDICTION
AND, IN THE ALTERNATIVE, TO TRANSFER**

Defendant Katheryn Hudson, professionally known as Katy Perry (“Perry”), by and through her undersigned counsel, hereby moves the Court for an order dismissing the First Amended Complaint for lack of personal jurisdiction over Perry pursuant the Federal Rules of Civil Procedure 12(b)(2) and, in the alternative, to transfer this action to the United States District Court for the Southern District of New York, or alternatively, for the Central District of California pursuant to 28 U.S.C. § 1404(a).

The grounds for this Motion are (1) that Perry does not have sufficient or systematic contacts with the State of Missouri necessary for general personal jurisdiction over her and that Perry does not have the necessary “minimum contacts” with the State of Missouri necessary to

confer jurisdiction over her, and (2), in the alternative, that it is in the interests of convenience and judicial economy, to transfer the action to the United States District Court for the Southern District of New York

This Motion is based on Perry's Memorandum Law, the Declaration of Katheryn Hudson ("Perry"), the Motion to Dismiss the First Amended Complaint or in the alternative to transfer filed by the other named Defendants, the Memorandum of Law and evidentiary materials submitted by the other Defendants in support of their Motion, all pleadings and files in this matter, all matters of which this Court may take judicial notice, and upon such other and further oral or documentary evidence as may be presented to the Court at or prior to any oral hearing that may be scheduled on Perry's Motion.

Dated: October 23, 2014

DOWD BENNETT LLP

By: /s/ James F. Bennett

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-And-

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By: /s/ Vincent H. Chieffo

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(Admitted *Pro Hac Vice*)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 23, 2014, a copy of the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system on all counsel of record.

/s/ James F. Bennett